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October 14, 2004

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

**Re: WC 03-211; Vonage Petition for Declaratory Ruling
WC 04-36; IP-Enabled Services**

Dear Ms. Dortch:

Today, Vonage Holdings Corp. ("Vonage") announced the completion of a Voice over Internet Protocol ("VoIP") E9-1-1 trial in the State of Rhode Island. As a result of the successful trial and collaboration with the State of Rhode Island, Vonage was able to deliver both caller's location and call back number to emergency service personnel for emergency calls placed using Vonage's broadband communications service. It was through the cooperation of the State of Rhode Island, Intrado and the State of Rhode Island's technical consultant, Arthur Kraus of AK Associates, that made the trial a success.

When a Vonage customer dials the digits 9-1-1, the call is routed over Vonage's 9-1-1 server using industry standard SIP protocol. The Vonage server then queries Intrado for routing instructions. The call is then directed to the selective router that serves the Rhode Island Public Safety Answering Point ("PSAP"). Simultaneously, Intrado places the customer's address and telephone number into the Automatic Location Information ("ALI") server. The supplementary special key unique to the call is included in the signaling, and allows the PSAP 9-1-1 operator to pull the customer's address and phone number from the ALI database. Vonage and Intrado are working with other states to provide similar solutions and intend to roll them out market by market.

Vonage is encouraged by its experience in Rhode Island and by the potential to improve the delivery of emergency services in an IP-enabled world. For the Commission's information, Vonage includes a press release concerning the success of the Rhode Island trial as well as a technical diagram that describes how the system works, attached hereto as exhibits 1 and 2. Vonage also includes a press release issued by the National Emergency Number Association

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(“NENA”) as exhibit 3. In the same press conference with Vonage, NENA announced the “Next Generation E9-1-1 Forum.” Please see the press release for further details.

Respectfully submitted,

/s/
William B. Wilhelm, Jr.
Ronald W. Del Sesto, Jr.

Attorneys for Vonage Holdings Corp.